

## **Substantial Amendment to the Consolidated Plan 2008 Action Plan for the Homelessness Prevention and Rapid Re-Housing Program (HPRP)**

Grantees eligible to receive funds under the Homelessness Prevention and Rapid Re-Housing Program (HPRP) are required to complete a substantial amendment to their Consolidated Plan 2008 Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD within 60 days of the publication of the HUD HPRP notice.

To aid grantees in meeting this submission deadline, the HPRP Notice reduces the requirement for a 30-day public comment period to no less than 12 calendar days for this substantial amendment. With this exception, HPRP grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate HPRP activities with the CoC's strategies for homeless prevention and ending homelessness. To maximize transparency, HUD strongly recommends that each grantee post its substantial amendment materials on the grantee's official website as the materials are developed.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424,
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and HPRP certifications.

For additional information regarding the HPRP program, visit the HUD Homelessness Resource Exchange ([www.hudhre.info](http://www.hudhre.info)). This site will be regularly updated to include HPRP resources developed by HUD and its technical assistance providers.

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The information collection requirements contained in this application have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number.

*Information is submitted in accordance with the regulatory authority contained in each program rule. The information will be used to rate applications, determine eligibility, and establish grant amounts.*

Public reporting burden for this collection of information is estimated to be 16 hours, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This information is required to obtain benefits. To the extent that any information collected is of a confidential nature, there will be compliance with Privacy Act requirements. However, the substantial amendment to the Consolidated Plan 2008 Action Plan does not request the submission of such information.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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**A. General Information**

<b>Grantee Name</b>	City of Cincinnati
<b>Name of Entity or Department Administering Funds</b>	Department of Community Development
<b>HPRP Contact Person</b> (person to answer questions about this amendment and HPRP)	Oren J. Henry
<b>Title</b>	Community Development Administrator
<b>Address Line 1</b>	Office of Budget and Evaluation
<b>Address Line 2</b>	801 Plum Street, Room 142
<b>City, State, Zip Code</b>	Cincinnati, Ohio 45202
<b>Telephone</b>	513-352-6264
<b>Fax</b>	513-352-3233
<b>Email Address</b>	oren.henry@cincinnati-oh.gov
<b>Authorized Official</b> (if different from Contact Person)	Milton Dohoney, Jr.
<b>Title</b>	City Manager
<b>Address Line 1</b>	801 Plum Street
<b>Address Line 2</b>	Room 152
<b>City, State, Zip Code</b>	Cincinnati, OH 45202
<b>Telephone</b>	513-352-3241
<b>Fax</b>	513-352-6284
<b>Email Address</b>	Milton.Dohoney@cincinnati-oh.gov
<b>Web Address where this Form is Posted</b>	http://www.cincinnati-oh.gov/cmgr/pages/-12848-/

<b>Amount Grantee is Eligible to Receive*</b>	<b>\$5,339,182</b>
<b>Amount Grantee is Requesting</b>	<b>\$5,339,182</b>

\*Amounts are available at <http://www.hud.gov/recovery/homelesspreventrecov.xls>

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### **B. Citizen Participation and Public Comment**

1. Briefly describe how the grantee followed its citizen participation plan regarding this proposed substantial amendment (limit 250 words).

Response: The HPRP Substantial Amendment to the 2008 Consolidated Plan requires the review of the Human Services Advisory Committee/Community Development Advisory Board, public notice in the City Bulletin and a newspaper of general circulation with a 12-day opportunity to comment, and a public hearing before the City Council.

- On April 20, 2009 the HPRP draft was posted at: [http://www.cincinnati-oh.gov/cmgr/pages/-12848-/](http://www.cincinnati-oh.gov/cmgr/pages/-12848/)
- Notice the City is accepting comments on the draft HPRP Substantial Amendment was made in the Cincinnati Enquirer on April 20, 2009, and in the City Bulletin.
- The Finance Committee held a Public Hearing on May 4, 2009 to discuss the proposed HPRP activity.
- The Human Services Advisory Committee/Community Development Advisory Board was mailed the draft HPRP Substantial Amendment in advance of their scheduled meeting May 7, 2009, and it was considered at that time.
- The City Council approved an ordinance authorizing the Consolidated Plan Substantial Amendment on or before May 13, 2009.
- The Substantial Amendment with any comments was submitted to HUD by May 18, 2009.

2. Provide the appropriate response regarding this substantial amendment by checking one of the following options:

- ☐ Grantee did not receive public comments.
- ☐ Grantee received and accepted all public comments.
- ☐ Grantee received public comments and did not accept one or more of the comments.

3. Provide a summary of the public comments regarding this substantial amendment. Include a summary of any comments or views not accepted and the reasons for non-acceptance.

Response:

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### **C. Distribution and Administration of Funds**

Reminder: The HPRP grant will be made by means of a grant agreement executed by HUD and the grantee. The three-year deadline to expend funds begins when HUD signs the grant agreement. Grantees should ensure that sufficient planning is in place to begin to expend funds shortly after grant agreement.

1. Check the process(es) that the grantee plans to use to select subgrantees. Note that a subgrantee is defined as the organization to which the grantee provides HPRP funds.

☐ Competitive Process

☐ Formula Allocation

☒ Other (Specify: Allocating in full for the Continuum of Care for the Homeless, Inc. to manage and subcontract to providers in a partnership with the Greater Cincinnati United Way.)

2. Briefly describe the process(es) indicated in question 1 above (limit 250 words).

Response:

The City of Cincinnati and Hamilton County plan for and administer homeless housing and services in a combined effort with the Cincinnati/Hamilton County Continuum of Care for the Homeless (OH-500). The Homeless and Special Needs section of both jurisdictions' Consolidated Plans reflect the work of the entire continuum effort. HPRP will be blended into the current activities of the Continuum and consolidated to ensure service to any eligible person/family within either jurisdiction.

The City HPRP funds will provide: 74% of the direct financial assistance for Prevention, the salary of the back end financial management person to pay all bills and account for all funds, and will provide all of their funds towards the RRH program. The County will provide the balance of the direct financial assistance for Prevention, support legal services efforts to prevent homelessness and support the Central Access Point "hotline" as a designated access call line for prevention and RRH for families.

To facilitate program coordination, information flow, services and reporting Hamilton County intends to subcontract its grant to the City of Cincinnati – for the purposes of developing a combined city/county program in conjunction with the Continuum of Care. All HPRP funding will be contracted to the Cincinnati/Hamilton County Continuum of Care for the Homeless, Inc. (CoC, Inc.) to administer.

The CoC, Inc. will provide the following HPRP:

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**1) Prevention** - The CoC has collaborated with the United Way of Greater Cincinnati (UW) and will use the UW funded Emergency Assistance centers plus one faith-based Emergency Assistance center as the Prevention Providers. The UW current funding within the agencies will be used for staffing while HPRP funds will provide direct financial assistance. The CoC will use HMIS (VESTA system) to acquire all data and pay all bills, in a consolidated administrative effort. A sub-grant arrangement with the Legal Aid Society of Greater Cincinnati will be issued to provide legal assistance as needed to prevent homelessness.

**2) RRH** - A qualified United Way and CoC agency, the Freestore/Foodbank, Inc., which provides comprehensive direct services to single homeless individuals was identified by both entities as the RRH provider. The Freestore was selected as it currently facilitates food stamp applications and work requirements, Medicaid outreach, SSI/SOAR, and SHP scattered-site housing for this population. The CoC, Inc. will contract with the provider for the case management and benefits services components of the program and all financial assistance will be from HPRP funds identified through HMIS and paid by the CoC, Inc.

3. Briefly describe the process the grantee plans to use, once HUD signs the grant agreement, to allocate funds available to subgrantees by September 30, 2009, as required by the HPRP Notice (limit 250 words).

Response:

The grantee intends to directly contract with the CoC, Inc. as the subgrantee for this program and will do so by September 30, 2009 or earlier.

The CoC, Inc. will provide all payments for direct financial assistance for Prevention and rental subsidies for RRH. The CoC, Inc. will subcontract with the Freestore/Foodbank to provide case management and benefit specialist services for RRH; and with Bethany House Services to utilize the Central Access Point staff as screeners for Prevention and in coordination with their RRH program as Housing Information Specialists, and with the Legal Aid Society of Greater Cincinnati for prevention legal services.

4. Describe the grantee's plan for ensuring the effective and timely use of HPRP grant funds on eligible activities, as outlined in the HPRP Notice. Include a description of how the grantee plans to oversee and monitor the administration and use of its own HPRP funds, as well as those used by its sub grantees (limit 500 words).

Response:

PROGRAM:

- a) Prevention – The program has been designed as a short-term (3-month) program. All participants will be required to meet with a caseworker at one of six existing Emergency Assistance (EA) centers prior to receiving assistance. All participants will be screened: a) that homelessness is imminent without this assistance, b) to ensure that they are cases who with HPRP limited direct

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financial assistance will prevent them from becoming homeless, and c) that they meet the 50% AMI criteria. The EA centers will be required to provide on-going case services and support to clients for three months. Services may be provided up to two times in the three-year period. Financial assistance for items eligible as listed on pages 13-19 of the notice is projected to average \$2,000 per case and not to exceed \$2,500 per case. Legal assistance as may be necessary to assist a client to remain in housing will be provided.

### **b) Rapid Rehousing**

- a. RRH for Singles – The program is designed as a medium-term (4-18 months) program with the average participant expected to stay no more than 12 months. The program will accept homeless single individuals from any of the Emergency Shelters indicated on the Housing Inventory Chart. Provision of intensive case management services to assist the participant to stabilize in housing, maintain their housing, increase skills and/or income and attend to any other special needs will be provided to each client. Financial assistance will be provided to cover security deposit, rent and utility assistance and as necessary may also be provided to cover past-due utility or rental payments to the extent that they prohibit a participant from being rehoused and fall within the 6 month limitation of the Notice.
- b. Case Management - Benefit Specialist – All of the Emergency Shelters identified in the Housing Inventory will have access to a benefit specialist, trained in the SOAR methods, which will facilitate Social Security and Medicaid benefits as may be necessary to assist persons to move from shelter to housing more rapidly.

Housing – A Housing Specialist will be hired to assist clients to access affordable housing. All Rapid Rehousing units for which direct assistance will be provided will be inspected for habitability standards.

### **MONITORING:**

Monitoring of specific activities provided to participants through the HPRP program will be through the HMIS system. All direct service agencies will use the local HMIS system – VESTA software and will be required to enter complete demographic information on each participant served as well as specialized intake and exit information. Documentation of consumer contact will be recorded in VESTA. Additionally, VESTA will be customized to handle all direct financial assistance associated with the program. Caseworkers will complete full demographic information on each participant and household member, and financial requests for rent, utilities, etc. will be made through VESTA to the CoC, Inc. A dedicated financial management staff person will be assigned to pay bills. Program coordination and oversight will also be provided by the CoC, Inc., and all provider agencies have agreed to a peer review process whereby a bi-weekly case management meeting will occur to review activities, outcomes, community coordination, and new opportunities/programs for participants.

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Contractual arrangements with the CoC, Inc. will require complete reporting on the program, pursuant to HUD guidance, every quarter as required by the Notice. Reporting from the CoC, Inc. will be provided to both the City of Cincinnati and Hamilton County as well as to HUD (field office and headquarters) as specified in the notice. Information as required for IDIS will be generated on an as-needed basis, as required by the grantee for IDIS accounting.

The CoC, Inc. will perform at least one on-site monitoring with all agencies participating in HPRP to ensure accurate data entry and recordkeeping.

An annual, independent, A-133 audit will be required of the CoC, Inc. and reviewed by both the City and the County once completed.

An annual, on-site monitoring of the CoC, Inc. will be performed by Community Development staff of Cincinnati and Hamilton County.

### **D. Collaboration**

1. Briefly describe how the grantee plans to collaborate with the local agencies that can serve similar target populations, which received funds under the American Recovery and Reinvestment Act of 2009 from other Federal agencies, including the U.S. Departments of Education, Health and Human Services, Homeland Security, and Labor (limit 250 words).

Response:

The CoC regularly collaborates with local agencies that serve the same and similar populations. In consideration of the resources available under ARRA the following collaborations will be encouraged:

- a. VAWA – Transitional Housing Assistance Grants will be applied for by the YWCA of Greater Cincinnati and coordinated with the CoC to provide transitional housing for victims of domestic violence.
- b. Job Training and Employment Services enhanced through the WIA Board with the use of ARRA will be coordinated with and referred to for job training, placement and retention services.
- c. All Prevention and RRH program consumers will receive screening and application assistance for public benefits enhanced through ARRA including food stamps, WIC, TANF, and Medicaid.
- d. Families who require childcare assistance will be coordinated with ARRA extended childcare block grant services and/or Head Start.

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- e. All homeless children residing within the family shelter system of the CoC are connected with Project Connect, the Cincinnati School's program under the Department of Education's – Education for Homeless Youth Program.
  - f. Community Action Agency is one of the Prevention sites under this program. Coordination will occur with their Community Services Block Grant funded efforts.
  - g. Though the utilization of the Benefit Bank software at all Prevention sites all consumers will have the opportunity to file their taxes (or re-file) claiming EITC as applicable.
2. Briefly describe how the grantee plans to collaborate with appropriate Continuum(s) of Care and mainstream resources regarding HPRP activities (limit 250 words).

Response:

Collaboration with the Continuum of Care is documented above.

The CoC has consistently collaborated with mainstream resource providers and will continue to do so through the HPRP in the following ways:

- 1) by creating a partnership between the United Way and the CoC for this effort;
  - 2) by designating existing Emergency Assistance agencies, for the Prevention work;
  - 3) by coordinating RRH with all shelters for single-individuals within the jurisdiction (CoC funded, privately funded, and faith-based);
  - 4) by continuing the coordination with Hamilton County Job and Family Services to access TANF, Food Stamps, Medicaid, child care, etc.;
  - 5) by collaborating services/benefits with the Veterans Administration as needed for homeless veterans;
  - 6) by having case management services establish connections for clients with mainstream services that may be necessary for on-going stability (e.g. substance abuse treatment, mental health care, physical care, educational support, job training/placement)
3. Briefly describe how HPRP grant funds for financial assistance and housing relocation/stabilization services will be used in a manner that is consistent with the grantee's Consolidated Plan (limit 250 words).

Response:

- h. This application amends the Consolidated Plans of both the City of Cincinnati and Hamilton County to include goals to establish a minimum of 50 new scattered-site transitional housing units for single, homeless individuals – as will be provided for by HPRP-RRH funds. This housing is



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expected to serve a minimum of 150 unduplicated individuals over a three-year period.

- i. This application amends the Consolidated Plans for both the City of Cincinnati and Hamilton County to provide a new program to Prevent Homelessness for approximately 2200 cases over a three-year period.

### **E. Estimated Budget Summary**

HUD requires the grantee to complete the following table so that participants in the citizen participation process may see the grantee's preliminary estimated amounts for various HPRP activities. Enter the estimated budget amounts for each activity in the appropriate column and row. The grantee will be required to report actual amounts in subsequent reporting.

<b>HPRP Estimated Budget Summary – City of Cincinnati</b>			
	<b>Homelessness Prevention</b>	<b>Rapid Re- housing</b>	<b>Total Amount Budgeted</b>
Financial Assistance <sup>1</sup>	\$3,408,239	\$1,066,350	\$4,474,589
Housing Relocation and Stabilization Services <sup>2</sup>	\$0	\$648,450	\$648,450
<b>Subtotal</b> (add previous two rows)	<b>\$3,408,239</b>	<b>\$1,714,800</b>	<b>\$5,123,039</b>

  

Data Collection and Evaluation <sup>3</sup>	\$27,000
Administration (up to 5% of allocation)	\$189,143
<b>Total HPRP Amount Budgeted<sup>4</sup></b>	<b>\$5,339,182</b>

<sup>1</sup>Financial assistance includes the following activities as detailed in the HPRP Notice: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, utility payments, moving cost assistance, and motel or hotel vouchers.

<sup>2</sup>Housing relocation and stabilization services include the following activities as detailed in the HPRP Notice: case management, outreach, housing search and placement, legal services, mediation, and credit repair.

<sup>3</sup>Data collection and evaluation includes costs associated with operating HUD-approved homeless management information systems for purposes of collecting unduplicated counts of homeless persons and analyzing patterns of use of HPRP funds.

<sup>4</sup>This amount must match the amount entered in the cell on the table in Section A titled "Amount Grantee is Requesting."

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**F. Authorized Signature**

By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete, and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

\_\_\_\_\_  
Signature/Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title